

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: December 22, 1978

SUBJECT: Asbestos Inspections - Certain-Teed, St. Louis, Missouri

FROM: William J. Keffer, P.E.
Chief, Technical Services Branch, SVAN

TO: W. Lamar Miller, Ph.D.
Director, Enforcement Division

Site: Certain-Teed
ID #: MO 980631162
Break: 12
Other: 12-22-78

We have received your letter of December 18 requesting additional work at the asbestos sources in St. Louis, and while we understand and agree with the urgency of controlling known airborne carcinogens, we have not yet completed arrangements for analyzing samples of asbestos. During the previous effort at GAF, we exhausted any known source of diffraction election microscopy with the three sources of the analytical work within the agency. As soon as we became aware of the potential effort at Certain-Teed, we began contacting the known private sources of analytical support to determine their competency and availability. As you can see from the justification on the attached requisition, the agency consensus is that there is only one dependable available source of this analytical service in the nation.

We are prepared to perform the field work, as you have requested, within one week of our receipt of a completed purchase order for the analytical services. Any efforts you may make to accelerate the processing of the requisition will be appreciated.

Although NESHAPS does not require actual sample collection, we feel adequate case preparation should include numerical documentation of airborne asbestos particles through sample collection, if visible emissions are detected, as well as evaluation of contamination by the water route. Due to the high probability of mixing zone problems inhibiting sample collection in the immediate vicinity of the confluence of the Missouri and Mississippi Rivers, we would recommend that you reconsider the site selection as:

- 1) Mississippi River at Alton, Illinois
- 2) Missouri River @ St. Louis WW intake, Private water company intake
- 3) Moline Creek upstream of sources
- 4) Mississippi River @ Cape Girardeau
- 5) Raw water samples from first downstream surface water supply below St. Louis
- 6) Two or more airborne samples collected by membrane filter equipment, following preliminary visible emissions evaluations.

cc: Sanderson
Spratlin
Morby
Bassey
Keffer
Harris

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Superfund

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[illegible]

PROCUREMENT REQUEST/REQUISITION
(Continuation)

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10. STOCK OR ITEM NO.	11. DESCRIPTION	12. QUAN- TITY	13. UNIT OF ISSUE	14. UNIT COST	15. AMOUNT
	<p>advises me that the University of Minnesota at Duluth and the Ontario Research Foundation (ORF) in Canada are the only 2 such laboratories. Since ORF is in a foreign country and State Department Clearance is required to use that facility, we request approval of this procurement request with the University of Minnesota at Duluth as a sole source supplier.</p>				

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